

# **EXHIBIT 3**

---

**From:** Anne Davis  
**Sent:** Friday, August 30, 2019 10:24 AM  
**To:** annie.sara@yahoo.com  
**Cc:** Josh Samra; Lesley Weaver; Derek Loeser; ibrahimhassan661@yahoo.com; kosta.hysa@yahoo.com; m.hysa@yahoo.com  
**Subject:** Facebook - Motion to Consider Relation

Dear Ms. Hassan,

I am sending this email to follow up on our phone conversation of Wednesday, August 28, 2019, which also included my colleague, Josh Samra. As I explained, Mr. Samra and I are part of the team of lawyers representing plaintiffs in the *In re Facebook, Inc., Consumer Privacy User Profile Litig.* (the “MDL”), which is currently pending in the Northern District of California. We appreciate you getting back to us in response to the Tuesday, August 27th email from Lesley Weaver, co-lead counsel in the MDL.

As we discussed (and as Ms. Weaver described in her email and voice messages to you and your co-plaintiffs) because your lawsuit arises from a substantially similar subject matter as the MDL—Facebook’s handling of user data and the agreements providing third party access to user data without consent—under the local rules of Northern District of California, Rule 3-12(b), we are obligated to promptly inform the Court by filing an Administrative Motion to Consider Whether Cases Should be Related. The MDL Plaintiffs may file the Administrative Motion as early as today.

As I indicated during our call, since the MDL is the earlier filed case, and as the Rule requires, we will file the Motion before Judge Vince Chhabria in the MDL Litigation and will also lodge courtesy copies with Judge Tigar and serve you and the other named plaintiffs in your action. Once the Administrative Motion is submitted (and any responses are timely filed), Judge Chhabria will make a determination as to whether the cases are related and if he determines that they are, may determine how your case will proceed.

We understand from our call that you are aware of the MDL, have reviewed portions of the Consolidated Amended Complaint and Facebook’s motion to dismiss, and that while you agree that there are some similarities, you are not yet decided as to whether you agree that the cases are related, in light of the difference between the request for restitution in *Hassan*, and the remedies sought in the MDL. We also understand that you intend to speak to the other named plaintiffs: Ibrahim Hassan, Kosta Hysa, and Mirela Hysa, about our call and Ms. Weaver’s email on the issue of relating the cases, and that you can speak for the *Hassan* Plaintiffs as to whether the *Hassan* Plaintiffs agree the matters are related. We have copied your co-Plaintiffs on this email, and are available to speak with them as well.

We discussed having a follow up call or email today (Friday, August 30, 2019) so that you can inform us as to whether the *Hassan* Plaintiffs have been able to decide whether you agree that the actions are related. I am available to speak by phone at 415-445-4016, or you can reply to this email.

Regards,  
Anne Davis

BLEICHMAR FONTI & AULD LLP  
555 12th St., Suite 1600, Oakland, CA 94607  
415.445.4016 | [adavis@bfalaw.com](mailto:adavis@bfalaw.com)